

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_ )

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO: )

All Cases )  
)

---

**Notice of Stipulation of Extension of Time for  
Tennessee Clinic Defendants to Respond to  
PSC'S MOTION FOR SANCTIONS AND FOR  
ORDER TO SHOW CAUSE [Doc. 3232]**

---

Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Specialty Surgery Center, PLLC; Kenneth Lister, MD, PC; Kenneth R. Lister, MD; and Donald Jones, MD (collectively "the Tennessee Clinic Defendants") hereby give notice to this honorable Court and all parties that, consistent with MDL Order No. 11 [Doc. 1524], the Tennessee Clinic Defendants and the PSC (two of the "Impacted Parties" with regard to this Motion) agree that the Tennessee Clinic Defendants shall have through January 9, 2017, to file a written response to the *PSC's Motion for Sanctions and for an Order to Show Cause*, filed December 15, 2016 [Doc. 3232]. This is the first extension for response to this Motion.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

/s/ Chris J. Tardio

**C.J. Gideon, Jr.\***

**Chris J. Tardio\***

**Alan S. Bean\*\***

**Matthew H. Cline\***

315 Deaderick Street, Suite 1100

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (615) 254-0459

[chris@gideoncooper.com](mailto:chris@gideoncooper.com)

***Attorneys for the Tennessee Clinic  
Defendants***

\* Admitted pursuant to MDL Order No. 1.

\*\* Admitted *pro hac vice*.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 28th day of December, 2016.

/s/ Chris J. Tardio

**Chris J. Tardio**